

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION

UNITED STATES OF AMERICA

vs.

CLEVELAND HARRIS WATKINS, II

CR. NO.:

6:17CR207

18 U.S.C. § 922(g)(1)

18 U.S.C. § 924(a)(2)

18 U.S.C. § 924(e)

18 U.S.C. § 924(c)(1)(A)

21 U.S.C. § 841(a)(1)

21 U.S.C. § 841(b)(1)(C)

18 U.S.C. § 924(d)

21 U.S.C. § 853

21 U.S.C. § 881

28 U.S.C. § 2461(c)

INDICTMENT

COUNT 1

THE GRAND JURY CHARGES:

On or about July 21, 2016, in the District of South Carolina, the Defendant, **CLEVELAND HARRIS WATKINS, II**, knowingly, intentionally, and unlawfully did possess with intent to distribute and did distribute a quantity of heroin, a Schedule I controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

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COUNT 2

THE GRAND JURY FURTHER CHARGES:

On or about July 22, 2016, in the District of South Carolina, the Defendant, **CLEVELAND HARRIS WATKINS, II**, knowingly, intentionally, and unlawfully did possess with intent to distribute and did distribute a quantity of heroin, a Schedule I controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 3

THE GRAND JURY FURTHER CHARGES:

On or about August 5, 2016, in the District of South Carolina, the Defendant, **CLEVELAND HARRIS WATKINS, II**, knowingly, intentionally, and unlawfully did possess with intent to distribute and did distribute a quantity of heroin, a Schedule I controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 4

THE GRAND JURY FURTHER CHARGES:

On or about October 8, 2016, in the District of South Carolina, the Defendant, **CLEVELAND HARRIS WATKINS, II**, having been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly did possess, in and affecting commerce, a firearm and ammunition, that is a Glock Model 17 9mm firearm and 9mm ammunition, all of which had been shipped and transported in interstate commerce;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 924(e).

COUNT 5

THE GRAND JURY FURTHER CHARGES:

On or about October 8, 2016, in the District of South Carolina, the Defendant, **CLEVELAND HARRIS WATKINS, II**, knowingly did possess a firearm in furtherance of a drug trafficking crime, which is prosecutable in a court of the United States;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

FORFEITURE

FIREARM/DRUG OFFENSES:

Upon conviction for felony violations of Title 18 and 21, United States Code as charged in this Indictment, the defendant, **CLEVELAND HARRIS WATKINS, II**, shall forfeit to the United States all of the defendant's right, title and interest in and to any property, real and personal,

- (a) constituting, or derived from any proceeds the defendant obtained, directly or indirectly, as the result of such violation(s) of Title 21, United States Code, and all property traceable to such property;
- (b) used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violations of Title 21, United States Code;
- (c) any firearms and ammunition (as defined in 18 U.S.C. § 921) –
 - (1) used or intended to be used to facilitate the transportation, sale, receipt, possession or concealment of controlled substances or any proceeds traceable to such property;
 - (2) involved in or used in any knowing violations of 18 U.S.C. §§ 922 and 924, or violation of any other criminal law of the United States, or intended to be used in a crime of violence;

PROPERTY:

Pursuant to Title 18, United States Code, Section 924(d), Title 21, United States Code, Sections 853 and 881, and Title 28, United States Code, Section 2461(c), the property which is subject to forfeiture upon conviction of the defendant for offenses charged in this Indictment includes, but is not limited to, the following:

A. Proceeds/Money Judgment:

A sum of money equal to all property the Defendant obtained as a result of the drug offenses charged in the Indictment, and all interest and proceeds traceable thereto as a result for their violations of 21 U.S.C. § 841.

B. Firearm and ammunition:

1. Glock Model 17, 9mm firearm
(Serial number: SGS806)
Asset ID: 17-ATF-003149
2. Miscellaneous rounds of ammunition
Asset ID: 17-ATF-003150

SUBSTITUTION OF ASSETS:

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) to seek forfeiture of any other property of defendants up to an amount equivalent to the value of the above-described forfeitable property;

Pursuant to Title 18, United States Code, 924(d), Title 21, United States Code, Sections 853 and 881, and Title 28, United States Code, Section 2461(c).

A True Bill

REDACTED

FOREPERSON


BETH DRAKE (DJB/twd)
UNITED STATES ATTORNEY